

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF NEW YORK

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MINEDMAP, INC., a Nevada : 1:19-CV-00501-DNH-CFH  
corporation

NOTICE OF MEMORANDUM  
OF LAW IN SUPPORT OF  
PLAINTIFF'S  
OPPOSITION TO  
DEFENDANTS' MOTION TO  
DISMISS

Plaintiff, :

against : (ECF Case)

MICHAEL MARANDA, an individual; :  
MICHAEL CARTER, an individual et  
al.

Defendants. :

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RESPECTFULLY SUBMITTED,

/s/ T. Edward Williams, Esq.

T. Edward Williams, Esq. Bar No. 5634738  
WILLIAMS LLP  
7 World Trade Center  
250 Greenwich 46<sup>th</sup> FL.  
New York, New York 10007  
Tel: 212.634.9106  
Fax: 212.202.6228  
Edward@williamsllp.com

**PLEASE TAKE NOTICE THAT**, Plaintiff MinedMap, Inc., through counsel, WILLIAMS LLP, is filing this Notice of Memorandum of Law in Opposition to Defendants' Motion to Dismiss and the Memorandum of Law in Opposition to Defendants' Motion to Dismiss. Plaintiff opposes Defendants' Motion to Dismiss because Plaintiffs has alleged that it has standing to sue because Plaintiff owned the Miners Defendants stole and because Plaintiff owned the sums paid to Defendants as deposits to be used against electrical costs Defendants were to incur in hosting Plaintiffs' Miners; because diversity jurisdiction exists, and so, this court lack discretion even if it does not grant Plaintiff's Civil RICO claim; and because Plaintiff has alleged mail fraud, wire fraud, and computer fraud with particularity.

April 22, 2021.  
New York, New York

**RESPECTFULLY SUBMITTED,**

/s/ T. Edward Williams, Esq.

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